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Mr. Kitoh's Declaration reports the results of testing that was performed under his direction to show that use of a collector having the thicker "predetermined parts" prior to joining the metallic foils (as claimed) provides a patentably distinct product when compared to the same product made using a collector having a substantially uniform thickness. Mr. Kitoh's Declaration is evidence (as opposed to "mere argument of counsel") that the process limitation recited in independent claim 1 provides a patentably distinct product.

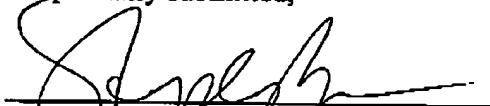
Examiner Crepeau tentatively agreed during a telephonic interview on February 3, 2005 that the type of evidence presented in Mr. Kitoh's Declaration would overcome the rejections of record. Examiner Crepeau did indicate, however, that he would have to review the Declaration once submitted in written form before making a final decision.

Applicants respectfully submit that the Declaration evidence attached hereto proves that the process limitations recited in claim 1 provide a patentably distinct product, and as such, all rejections based on the art of record should be reconsidered and withdrawn.

Should Examiner Crepeau deem that any further action by the Applicants would be desirable in placing this application in even better condition for issue, he is requested to telephone Applicants' undersigned representative.

The Commissioner is hereby authorized to charge any additional fees associated with this communication or credit any overpayment to Deposit Account No. 50-1446.

Respectfully submitted,


Stephen P. Burr
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SPB/tlp

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Attachment:

Declaration Under 37 CFR 1.132
(signed by Kenshin Kitoh)